



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION III**  
**Four Penn Center – 1600 John F Kennedy Blvd**  
**Philadelphia, Pennsylvania 19103-2852**

**Report Title:** Clean Air Act Inspection of Plymouth Tube  
**Inspection Date(s):** 11/22/2022  
**Regulatory Program(s):** Title V, NESHAP  
**Company Name:** Plymouth Tube Company  
**Facility Name:** Plymouth Tube Company  
**Facility Location:** 2000 Industrial Parkway  
Salisbury, MD 21801  
**Latitude:** 38.3968 **Longitude:** -75.5895  
**County/Parish:** Wicomico County  
**AFS Number:** 3600099965  
**Permit Number:** 24-045-0121  
**NAICS Code:** 331210 **SIC:** 3499  
**Unique Project #:** 3E23CA028A

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**EPA Lead Inspector**

**Signature**

**Paul Arnold**

**Date**

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**Supervisor**

**Signature**

**Erin Malone**

**Date**

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## **I. Introduction**

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Plymouth Tube Company (PTC or Facility) to verify compliance with applicable State and Federal regulations. The Maryland Department of the Environment (MDE) was notified of the inspection on November 8, 2022, via email. On November 21, 2022, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to William Newman of Plymouth Tube Company, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

### **A. Summary of the Facility**

The Facility is located at 2000 Industrial Parkway, Salisbury, Maryland 21801. PTC is a privately owned company that resizes metal piping. PTC receives, exclusively, stainless-steel piping. PTC draws down, or stretches, received piping to create piping that has a smaller diameter. PTC largely operates as a job shop, or batch process, making specific pipe sizes for each client/job. PTC has been operating at the Salisbury, MD facility since 1984. PTC has about sixty fulltime employees. PTC operates five days a week, two shifts per day. PTC is currently operating at about 70-80 percent capacity. The resizing process requires the pipe to be lubricated, drawn, heated, and cleaned (via a vapor degreaser).

The Facility received a Title V Operating Permit (24-045-0121) from MDE, issued on January 13, 2016.

PTC is classified as a major source of air emissions for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP). The Facility is subject, or potentially subject, to the following federal regulations:

- 40 CFR, Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
- 40 CFR, Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning

### **B. Inspection Opening Conference**

At 10:30 AM on November 22, 2022, EPA inspectors arrived at the Facility for a CAA inspection and conducted a brief opening conference. PTC was represented by Jenna Griffith and William Newman. Also, Dave Dat, of MDE, was present for the inspection. EPA inspectors, Paul Arnold and Carly Joseph, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Jenna Griffith did not claim any photos or documentation as CBI.

## **II. Site Activity/Process Description**

PTC receives monthly shipments of stainless-steel piping (Photo 1). The piping is first taken to a draw bench (Photo 2) where the pipe is coated with a methacrylate copolymer lubricant and is cold drawled to a desired diameter/size. As a byproduct of the drawling, the overall length of the pipe is increased. The pipe is then cut to a desired length, cleaned in the vapor degreaser (Photos 3 & 4), annealed in the 3.9 MMBtu gas-fired furnace (Photos 6 – 8) and shipped to the purchaser (Photo 9). Some jobs require repeated passes through the entire process to achieve the desired size/diameter, while others require only one pass through the process.

PTC has two degreasers onsite, a primary and a backup. Ms. Griffith said that the backup degreaser has not been used in, at least, five years. Since 2021, the degreasers have used n-Propyl Bromide to clean the piping. Prior to 2021, PTC used Trichloroethylene in the degreasers. The primary degreaser has a maximum capacity of 2,000 pounds of piping. Degreasing time can vary from 30 to 90 minutes. Both degreasers have VOC emissions controlled by a three-bed carbon adsorber (Photo 5). The carbon adsorber is rated at 6,600 cubic feet per minute and has a 98 percent control efficiency. PTC has opted to demonstrate compliance with 40 C.F.R. Part 63 Subpart T by maintaining records of freeboard ratio, freeboard chiller, reducing draft, and remaining fully covered – which is a compliance option allowed by Subpart T.

PTC has two 4.2 MMBtu/hr gas-fired boilers. PTC operates only one boiler at a time. The primary boiler is designated as the “North Boiler” and was installed in 1996. The backup boiler is designated as the “South Boiler” and was installed in 1982. Steam generated from the boilers is used for process steam to heat the degreasers. PTC has no emergency generators.

The opening conference concluded at 12:15 PM.

## **III. Observations**

EPA inspectors were led on a walkthrough of the Facility at 1:41 PM by William Newman and Jenna Griffith of PTC. Dave Dat, of MDE, was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2).

All process equipment, the carbon bed adsorber and the two boilers were observed during the facility walkthrough. However, none of the equipment, except for the South Boiler, was operating during the plant walkthrough. Some equipment preparation and maintenance appeared to be occurring.

The walkthrough concluded at 2:22 PM.

#### IV. Records Review

The records review commenced immediately after the plant walkthrough at 2:30 PM. EPA inspectors reviewed documents requested in the November 21, 2022, email to William Newman (see Attachment 1). Records were provided at the time of the inspection by Facility representatives. Below are the records requested and what was provided:

EPA reviewed the PTC's 2018 to 2022 records of; annual emissions, audio/visual/olfactory (AVO) records for the degreaser components, degreaser temperature logs, n-Propyl Bromide and Trichloroethylene usage and the boiler maintenance records.

PTC Annual Facility Emissions and Production (ton/year)

	NOx	SOx	VOC	PM10	HAP	Pipe Production
2018	3.4	0.00	21	0.06	20.9	386
2019	1.2	0.01	59.1	0.02	59	453
2020	1.2	0.0	50.05	0.02	50	325
2021	0.9	0.0	21	0.06	20.9	265

#### V. Closing Conference

After the records review, EPA inspectors, William Newman, Jenna Griffith, and Dave Dat had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 3:45 PM.

The following has been identified as a *potential* issue during the inspection. It is an issues that requires either further investigation by EPA or additional information or explanation by Plymouth Tube Company.

- The two 4.2 MMBtu/hr gas-fired boilers may be subject to 40 CFR, Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

## **VI. List of Attachments**

Attachment 1: Email correspondence to William Newman of records requested to review during inspection

Attachment 2: Photo Log